



Seyfarth Shaw LLP

620 Eighth Avenue
New York, New York 10018

T (212) 218-5500

F (212) 218-5526

casmith@seyfarth.com

T (212) 218-5605

www.seyfarth.com

MEMO ENDORSED

November 20, 2023

VIA ECF

Hon. Jessica G. L. Clarke, U.S.D.J.
Southern District of New York
500 Pearl Street, Courtroom 20C
New York, NY 10007

**Re: *Shukla v. Deloitte Consulting LLP, et al.*,
Civ. No.: 1:23-cv-10150 (S.D.N.Y.)**

Dear Judge Clarke:

This firm represents Meta Platforms, Inc. (“Meta”) in the above-referenced action. We write jointly with Deloitte Consulting, LLP (collectively with Meta, “Defendants”) to respectfully request an extension of the deadline for Defendants to respond to the Complaint, from November 24, 2023 to December 22, 2023, and an extension of the deadline to respond to Plaintiff’s Motion for Remand, from December 4, 2023 to December 15, 2023, with a corresponding extension of Plaintiff’s reply deadline for the Motion to Remand from December 11, 2023 to December 22, 2023.

By way of background, Deloitte Consulting LLP, with the consent of Meta, timely removed this action from the Supreme Court of New York, New York County on November 17, 2023. (ECF No. 1.) On November 19, 2023, Plaintiff filed a Motion to Remand this action to State Court. (ECF No. 9.) Under FRCP 81(c), Defendants’ deadline to respond to the Complaint is November 24, 2023. And under L. Civ. R. 6.1(b), Defendants’ deadline to respond to Plaintiff’s Motion for Remand is December 4, 2023, with Plaintiff’s reply due by December 11, 2023.

In light of the impending Thanksgiving holiday, and to provide Defendants with additional time to respond appropriately to the voluminous Complaint and its 15 causes of action, Defendants respectfully request an extension of the deadline to respond to the Complaint, from November 24, 2023 to December 22, 2023, and an extension of the deadline to respond to Plaintiff’s Motion for Remand, from December 4, 2023 to December 15, 2023, with a corresponding extension of Plaintiff’s reply deadline for the Motion to Remand from December 11, 2023 to December 22, 2023.

This is Defendants’ first request for an extension of the responsive pleading deadline and first request for an extension of the briefing deadlines for Plaintiff’s Motion for Remand in this action. This application is being made in good faith and not to cause undue delay. If



Hon. Jessica G.L. Clarke
November 20, 2023
Page 2

granted, this request will not impact any other scheduled dates. The parties do not presently have any scheduled appearances before the Court.

This office has communicated with Plaintiff regarding the request for an extension of Defendants' deadline to respond to the Complaint, and Plaintiff does not consent to this request. Plaintiff explained his refusal to consent by claiming he does not "have an [sic] authority to grant you any extension on this matter" and his belief that a "request for extension after removal is improper." This office has communicated with Plaintiff regarding the request for an extension of Defendants' deadline to respond to Plaintiff's Motion to Remand, and Plaintiff has not yet replied.

We thank the Court in advance for its time and attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Cameron Smith

Cameron Smith

cc: All counsel of record (via ECF)
Pro Se Plaintiff Ashu Shukla (via ECF)

The deadline for defendants to answer, move or otherwise respond to the Complaint is EXTENDED to **December 22, 2023**. The deadline for defendants' opposition to the motion to remand is EXTENDED to **December 15, 2023**. The deadline for Plaintiff's reply brief is **December 22, 2023**.

SO ORDERED.

A handwritten signature in blue ink that reads 'Jessica Clarke'.

JESSICA G. L. CLARKE
United States District Judge

Dated: November 21, 2023
New York, New York